

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF FLORIDA
MIAMI DIVISION
CASE NO. 1:22-cv-24023-SCOLA/GOODMAN**

KENNETH C. GRIFFIN,

Plaintiff,

v.

INTERNAL REVENUE SERVICE and U.S.
DEPARTMENT OF THE TREASURY,

Defendants.

**DECLARATION OF JASON STERNBERG IN SUPPORT OF
PLAINTIFF'S EXPEDITED MOTION TO COMPEL DISCOVERY**

I, JASON STERNBERG, hereby declare the following:

1. I am a partner with the law firm Quinn Emanuel Urquhart & Sullivan, LLP, and counsel for Plaintiff Kenneth C. Griffin (“Mr. Griffin”) in the above-captioned action.
2. I respectfully submit this Declaration in Support of Plaintiff’s *Expedited Motion to Compel Discovery*.
3. Attached hereto as **Exhibit 1** is a true and correct copy of correspondence from Defendants’ counsel to Plaintiff’s counsel on May 29, 2024.
4. Attached hereto as **Exhibit 2** is a true and correct copy of the Declaration of Jonathan E. Jacobson, Trial Attorney, U.S. Department of Justice, Criminal Division, Public Integrity Section, signed on May 29, 2024.
5. Attached hereto as **Exhibit 3** is a true and correct copy of the Declaration of Scott H. Moffit, Special Agent in Charge, Treasury Inspector General for Tax Administration, signed on May 29, 2024.

6. Attached hereto as **Exhibit 4** is a true and correct copy of a document produced by Defendants on May 29, 2024, which has been Bates stamped as IRS-0000849. This document was designated as confidential under the Protective Order and, as such, will be filed under seal in its entirety.

7. Attached hereto as **Exhibit 5** is a true and correct copy of a document produced by Defendants on May 29, 2024, which has been Bates stamped as IRS-0000847. This document was designated as confidential under the Protective Order and, as such, will be filed under seal in its entirety.

8. Attached hereto as **Exhibit 6** is a true and correct copy of a document produced by Defendants on May 29, 2024, which has been Bates stamped as IRS-0000895. This document was designated as confidential under the Protective Order and, as such, will be filed under seal in its entirety.

9. Attached hereto as **Exhibit 7** is a true and correct copy of a document produced by Defendants on May 29, 2024, which has been Bates stamped as IRS-0000702. This document was designated as confidential under the Protective Order and, as such, will be filed under seal in its entirety.

10. Attached hereto as **Exhibit 8** is a true and correct copy of a document produced by Defendants on May 29, 2024, which has been Bates stamped as IRS-0000705. This document was designated as confidential under the Protective Order and, as such, will be filed under seal in its entirety.

11. Attached hereto as **Exhibit 9** is a true and correct copy of a document produced by Defendants on May 29, 2024, which has been Bates stamped as IRS-0000216. This document was

designated as confidential under the Protective Order and, as such, will be filed under seal in its entirety.

12. Attached hereto as **Exhibit 10** is a true and correct copy of a document produced by Defendants on May 29, 2024, which has been Bates stamped as DOJ-000000001. This document was designated as confidential under the Protective Order and, as such, will be filed under seal in its entirety.

13. Attached hereto as **Exhibit 11** is a true and correct copy of the United States' Opposition to Counterclaim Plaintiff's Motion for Leave to Amend (ECF 265) in *United States v. Musin, et al.*, No. 4:09-cv-00062 (S.D. Iowa March 10, 2011).

I declare under penalty of perjury that the foregoing is true and correct.

Executed on June 3, 2024.

/s/ Jason D. Sternberg
Jason D. Sternberg